The respondent, F. E. Brody, files herein brief comments relating to FCC Proceeding number 98-182, filed on 12 NOV 2002 (FCC doc date) by the Personal Radio Steering Group.

Said proposal is for rulemaking is also noted as FCC RM-9222 in reference to various rules changes proposed for the Multiple Use Radio Service (MURS).

The respondent has no financial interests in this proceeding other than desiring to continue to use the MURS service as it is now generally authorized: Where applicable as an effective low-cost, easy to use, short range communications solution.

===BEGIN RESPONDENT'S ADDITIONAL COMMENTS TO 98-182 ===

Re: Petitioner's "Part II item 5."

No connection to the PSTN or any similar network service should be permitted on the MURS. The service is designated to be a low cost, short range service. With only 5 channelized frequencies authorized, and these same frequencies still in use by a large number of grandfathered licensees, inadequate spectrum is available to allow for the creation of distant linked stations or traffic. Allowing any glimmer of network connection would surely strangle the service – especially because data transmission is already permitted. With the excellent propogation of the authorized frequencies, I can foresee data-like and/or APRS nets springing up = connected via VoIP, CableTV nets, DSL, etc. This type of activity should be relegated to the Amateur Radio Service (ARS) and other LM venues.

Re: Petitioner's "Part III item 11."

The regs for MURS, much like those for most 2-way services, already require the user to monitor before transmitting. The methodology of monitoring the frequency to check for existing and/or emergency traffic should be left to the user. Virtually all radios already contain some sort of easily accessed monitor function -- usually adjacent to the Push-To-Talk (PTT) switch or a squelch control. The FCC regulations have generally stated the desired specification or outcome and left it to the users and/or manufacturers to devise the 'how to' compliance. MURS should be no different.

The petitioner's proposal in this section is in fact a technical 'how-to', and one which would be quite inconvenient to the typical MURS user. The real world fact is that most new users do not read, nor even have a copy of the MURS regulations. Much like the FRS service, MURS radios have become an appliance like intuitive design – as simple as Push-To-Talk & Release-To-Listen. Operational complications and the resultant transmissions delays like those proposed will just get the users to modify their radios to remove any such interlocks. The rather short range typical of these types of low power radios rarely allows for any sort of reliable public safety utilization.

Additionally, constantly changing equipment requirements will discourage manufacturers from introducing new radios for this service. It is very difficult, given the design-to-certification cycle time, to try to hit a constantly moving target. An example of this is the lack of new equipment during all of late 2001 and 2002, awaiting the activation of the then new MURS rules changes.

Re: Petitioner's Part IV.

Grandfathered licensees who are operating under their current authorization that exceed any of the current MURS requirements should be required to identify their station. Many of these licensees are surprised to now be sharing the frequency, one that they 'paid for' with license and coordination fees. They have no priority over those who are merely licensed-by-rule. However, the station ID would be a very good indicator to others that what they perceive to be a violation of MURS operating rules (typically higher power or split band operation) may in fact be allowed. This will allow interested parties and/or user organizations to verify/self-police the privileges by easily researching them on the FCC ULS system.

===END RESPONDENT'S ADDITIONAL COMMENTS to 98-182 ===

Respectfully submitted,

07 JULY 2003
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